Port Heiden Supersack Recovery Plan

Dave Bartus to: Howard, Louis R (DEC), Pat Roth 02/16/2012 03:14 PM
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Louis and Pat:

Thank you and others for keeping EPA Region 10 in the loop on the Port Heiden supersack incident, and the planned recovery activities. In general, Region 10 is comfortable that appropriate steps are being conducted in this matter with regard to TSCA requirements. One element of the proposed recovery plan dated February 8, 2012, does warrant review.

The particular issue appears in the last paragraph of Step 2 of Section 4.0. The text in question reads:

> "The PCB solids are non soluble and the water generated with the dredging operation should be able to be discharged back into the river after filtration."

40 CFR 761.79(b)(1)(iii) establishes a concentration-based standard for decontamination standard for water containing PCBs of 0.5 µg/l, or approximately 0.5 parts per billion. Given that water in question is likely to contain or have been in contact with PCBs, this decontamination standard would apply to water associated with recovery and dewatering of the supersack in the phase separation tanks. While it is likely that this standard can be met through careful filtration of water in the phase separation tanks, compliance with this decontamination standard should be verified through analytical sampling and analysis prior to discharge. Provided compliance with the 0.5 µg/l decontamination standard can be demonstrated through analytical testing, there should be no regulatory issue under TSCA with unrestricted discharge of the water.

The phase separation tank system illustrated in Figure 10 appear to be appropriate for dewatering of the recovered supersack, and appears consistent with similar systems used elsewhere in the region for cleanup and dewatering of PCB remediation waste. It would be a good idea to have a written procedure prepared before recovery operations begin that addresses decontamination of tanks and equipment that will be in contact with the recovered supersack material, and for disposal of filter media used for dewatering.

Please don't hesitate to give me a call or an e-mail if you have any comments or questions.

Dave